Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Digital Television Distributed Transmission System Technologies	)	MB Docket No. 05-312
	)	

To: The Commission

COMMENTS OF LIN TELEVISION CORPORATION

LIN Television Corporation ("LIN") writes to support the Commission's efforts in developing rules for distributed transmission system ("DTS") technologies, and to encourage the Commission to move promptly in resolving the outstanding issues raised in the recent Notice of Proposed Rulemaking ("NPRM") for DTS.[1] Although there are a few remaining technical and policy hurdles still to be overcome in the development and implementation of DTS operations, LIN believes that such problems are not insurmountable and that the public will benefit from the prompt adoption of a regulatory framework for DTS.

Distributed transmission technology offers important features and capabilities that will benefit the public as broadcasters continue to adopt the technology. First, DTS enables broadcasters to provide over-the-air service to viewers who live in areas where the terrain blocks signals from a single-tower system. Second, DTS enhances the signals that viewers in urban locations are able to receive. Finally, the public can benefit from all of these facets of DTS

[1] Clarification Order and Notice of Proposed Rulemaking, *Digital Television Distributed Transmission System Technologies*, FCC 05-192, MB Docket No. 05-312 (rel. Nov. 4, 2005) ("NPRM").

without having to experience significant delays or expense, as broadcasters may be able to build out DTS systems using already-existing cellular and PCS towers.

Viewers who live in terrain-blocked areas will benefit from distributed transmission systems. A multiple-transmitter DTS network would enable these viewers to receive clear signals from a DTS transmitter, rather than suffering disruptions in service because the signal from the main transmitter is obstructed by intervening terrain or buildings.[2] "The anticipated benefits include reaching populations that would not otherwise be served by conventional means. A station would be able to design its arrangement of DTS transmitters so that it reaches populated areas that have been obstructed by terrain or buildings from prior direct reception of its signal."[3]

The use of DTS also promotes the DTV transition by making it possible for broadcasters to deliver more reliable high-definition and multicast digital programming to their viewers. Access to these services will promote consumer acceptance and adoption of DTV technology. These digital offerings will provide an alternative to viewers who, because of poor reception, currently must rely on pay-television services such as cable and satellite to receive their local stations.

Urban viewers will reap the benefits of DTS because of its ability to provide a more uniform and more powerful signal inside homes. Multiple DTS transmitters can broadcast several signals to a viewer's home. In analog broadcasting, these multiple signals would create

---

[2] *See* Comments of the Association for Maximum Service Television, Inc. and the National Association of Broadcasters, in MB Docket No. 03-15 (April 21, 2003) ("MSTV/NAB Comments") at 32.

[3] NPRM at ¶ 12.

interference that would make the signal difficult or impossible to view.[4] In contrast, DTS can make use of the adaptive equalizers in DTV receivers in order to ensure that the viewer receives a single, clear signal from the group of multiple and reflected signals that the household may be receiving.[5] Along with the ability to overcome terrain problems, more reliable indoor reception is thus a key advantage of distributed transmission technology.[6]

In most cases, existing towers already in place for cellular or PCS services should be adequate for the placement of DTS transmitters. Unlike single-tower systems, which require a maximum of height and power to reach viewers at the edges of their coverage areas, DTS's ability to use multiple transmitters permits DTS broadcasters to rely on a network of smaller, lower-powered facilities.[7] Accordingly, broadcasters investing in DTS will not be required to obtain the funds and the zoning authorizations that would be necessary for the construction of tall towers and high-powered facilities.

* * *

LIN is pleased that the Commission has recognized the potential that DTS technology offers. The technology has been developed over many years, and the Commission has been aware of and receptive to the need for a DTS regulatory framework for a similarly

---

[4] *Id.* at ¶ 2.

[5] *Id.*

[6] *Id.* at ¶ 8.

[7] *Id.* at ¶ 12 (DTS provides an "alternative to stations whose single-tower proposals may have been stymied by tower height and placement limits associated with aeronautical safety or local zoning concerns").

lengthy period of time.[8] LIN encourages the Commission to move promptly in order to establish rules for distributed transmission systems so that its benefits can be brought to the public.

[8] *See, e.g.*, MSTV/NAB Comments at 32 ("time is of the essence").

Respectfully submitted,

Gregory M. Schmidt
Vice President New Development and General Counsel,
LIN Television Corporation

February 6, 2006